

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

United States of America,)	
Plaintiff)	
)	No. 08 CR 122-8
v.)	
)	Hon. Judge St. Eve
Melvin Holmes, et al.)	
Defendants)	

MOTION FOR LEAVE TO TRAVEL TO JACKSON, MISSISSIPPI

NOW COMES the Defendant, MELVIN HOLMES, by and through his attorneys, The Law Office of Ralph J. Schindler, Jr., and does move this court for leave for the Defendant to travel to Jackson, Mississippi for the purposes of visiting his infant daughter and his girlfriend, the child's mother. In support of such Motion, Defendant does state as follows:

1. That pursuant to this court's order, the Defendant's ability to travel has been restricted;
2. Defendant's girlfriend is in school and lacks the time and financial ability to travel to Illinois to see Defendant.
3. Defendant's daughter is five months old and Defendant has not been able to see her for nearly three months.
4. This court had previously granted Defendant's request to travel to Jackson from August 7, 2009 to August 14, 2009, but Defendant was unable to travel during that period due to a death in his family.

5. Defendant now wishes to reschedule his trip, and travel to Jackson, Mississippi from August 22, 2009 to August 30, 2009.
6. Defendant does not have any court dates scheduled during that time.
7. As with the previous motion to travel, Counsel for the Defendant has spoken with the Defendant's Pretrial Services agent, James Wheatly, and AUSA Terra Brown concerning Defendant's desire to travel and both are without objection to Defendant traveling as requested.

WHEREFORE, Defendant respectfully requests the court's permission to allow such travel as a modification of the current terms and conditions of his release.

Respectfully submitted,
/s/ Ralph J. Schindler, Jr.
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Attorney for MELVIN HOLMES

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